

# EXHIBIT A

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):



FEPA

**410-2023-07786**

EEOC

and EEOC

\_\_\_\_\_  
State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

**RECEIVED AT ATDO EEON ON 5/4/2023**

Home Phone (Incl. Area Code)

Date of Birth

**Ms. Cassandra Thompson****(856) 417-4149****December 7, 1991**

Street Address

City, State and ZIP Code

**225 Johnson Rd Apt 37A****Forest Park, GA 30297**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

No. Employees, Members

Phone No. (Include Area Code)

**Cherokee County Division of Family and Children Services****15+****(770) 720-3610**

Street Address

City, State and ZIP Code

**1300 Univeter Rd****Canton, GA 30115**

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)



RACE



COLOR



SEX



RELIGION



NATIONAL ORIGIN



RETALIATION



AGE



DISABILITY



GENETIC INFORMATION

☐ OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

February 21, 2023

February 21, 2023



CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- I. On or around March 2022, I began working for the company as a Social Services Specialist/Case Manager.
- II. A month or so later, I learned that I was pregnant with my first child and informed the company.
- III. On or around September 2022, I told my immediate supervisor, Christine Ortiz, that my caseload was stressful and completing my tasks was difficult since my work computer was down, and the company would not provide a loaner computer. I went weeks without a work computer, but Ms. Ortiz said this was no excuse and that I should have gone into the office and completed my notes.
- IV. On or around September 15, 2022, I expressed my concerns to Ms. Ortiz's manager, Malissa Rich. Ms. Rich said that I would be required to come into the office every day to take notes. This was intended to help me, however, it only added to my workload because I live an hour away. I informed Ms. Rich that it felt more like a reprimand, especially since I didn't have a lot of money to commute to the office every day. I became homeless, so the company gave me information about EAP services, but also gave me my first warning. Around this same time, I requested FMLA leave to begin November 21, 2022, and HR informed me that I would be approved.
- V. On or around October 15, 2022, my doctor faxed my medical documentation to Naomi Matthews for FMLA leave.
- VI. On or around October 30, 2022, the company questioned whether I was coming into the office on time and issued me a final warning.
- VII. From November 21, 2022, through December 12, 2022, I was on leave. I delivered my daughter on November 22, 2022.
- VIII. On or around December 8, 2022, the company denied my FMLA leave and said I needed to report to work on January 9, 2023. My doctor said no, that I would need an accommodation to be off from work until January 22.

IX. On or around January 19, 2023, the Department of Labor began an investigation into my FMLA qualification. On or around January 23, 2023, the company asked me to return to work because they didn't have any remote work for me to perform so I returned to work. On January 25, 2023, DOL confirmed that I was eligible for FMLA leave and on January 26, 2023, the company told me to ignore the denial letter they sent and that I could resume my leave on January 27. From January 27 through February 21, 2023, I was on approved FMLA leave.

X. On February 21, 2023, I returned to work. I was asked to drive four hours to bring a client their shoes and other items, but I told the company I couldn't because my car would not make it that far but would be able to if I had a rental. I ended up taking the drive and my tire blew. The company then said they could provide me with a rental car, but then they realized it would be cheaper to just mail the items off. Rebecca Mullinax, Admin Secretary, was instructed to mail the items. Later that day, the CEO, Brooke Ford, called me into her office and had Kristin Walker from HR on the phone. I was told that they were terminating me. I was shocked because I was not expecting to be terminated, especially since I had already been working that day, and when I asked what I did wrong they refused to discuss it, saying they were not going to argue with me. They asked me if I needed a box for my things and told me I could go to unemployment, however, the separation notice stated the reason for my termination was for not following instructions. The company told unemployment that I failed to follow instructions when requesting documentation, but I am unaware of what they are referring to because I provided documentation requested.

X. I believe I was discriminated in violation of the Americans with Disabilities Act.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

05/01/2023

Electronically Signed 2023-05-01 21:42:17 UTC - 172.58.4.215  
Nitex AssureSign® Teztec178-50c1-45ee-9472-all501571416

Date

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Ianna O. Richardson | [ianna@justiceatwork.com](mailto:ianna@justiceatwork.com) | Barrett & Farahany